

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
ROBERT D. CHAIN, )  
 )  
Defendant. )  
\_\_\_\_\_

CRIMINAL NO. 18cr10322

VIOLATIONS:

COUNTS ONE – SEVEN:  
18 U.S.C. § 875(c) (Use of Interstate  
and Foreign Commerce to Transmit  
a Threat to Injure Another Person)

The Grand Jury charges that:

INTRODUCTORY ALLEGATIONS

1. At all times material to the allegations below, ROBERT D. CHAIN (“CHAIN”) was an individual who resided in Encino, California.

2. The *Boston Globe* (“the *Globe*”) is a daily newspaper founded and based in Boston, Massachusetts. The *Globe* is the largest and most read newspaper in the Commonwealth of Massachusetts.

3. On or about August 10, 2018, the *Globe* announced that it was requesting that other newspaper publications around the country publish a coordinated editorial response to political attacks on the media. In its request, the *Globe* editorial board stated, “[p]ublications, whatever their politics, could make a powerful statement by standing together in common defense of their profession and the vital role it plays in government for and by the people.” The coordinated editorial response was to be published on Thursday, August 16, 2018.

4. Beginning on or about August 10, 2018, after the publication of the *Globe*’s announcement, and continuing until on or about August 22, 2018, CHAIN made fourteen telephone calls from outside the Commonwealth of Massachusetts to the *Globe* newsroom. In the telephone calls, CHAIN threatened to shoot and kill *Globe* employees.

**COUNT 1**

**(18 U.S.C. § 875(c) – Use of Interstate and Foreign Commerce  
to Transmit a Threat to Injure Another Person)**

5. The allegations contained in paragraphs 1 through 4 are re-alleged and incorporated herein by reference.

6. On or about August 10, 2018, in the District of Massachusetts and elsewhere,

**ROBERT D. CHAIN,**

defendant herein, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit: a telephone call originating outside the Commonwealth of Massachusetts answered by Individual A, a *Globe* employee located in Boston, Massachusetts, in which he stated, “you are the enemy of the people and we are going to shoot you all.” CHAIN made this statement intending that his message communicate a threat and knowing that it would be interpreted as a threat.

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 2**

**(18 U.S.C. § 875(c) – Use of Interstate and Foreign Commerce  
to Transmit a Threat to Injure Another Person)**

7. The allegations contained in paragraphs 1 through 4 are re-alleged and incorporated herein by reference.

8. On or about August 10, 2018, in the District of Massachusetts and elsewhere,

**ROBERT D. CHAIN,**

defendant herein, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit: a telephone call originating outside the Commonwealth of Massachusetts answered by Individual A, a *Globe* employee located in Boston, Massachusetts, in which he stated, “you fucking cunt. We’re going to shoot you all.” CHAIN made these statements intending that his message communicate a threat and knowing that it would be interpreted as a threat.

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 3**

**(18 U.S.C. § 875(c) – Use of Interstate and Foreign Commerce  
to Transmit a Threat to Injure Another Person)**

9. The allegations contained in paragraphs 1 through 4 are re-alleged and incorporated herein by reference.

10. On or about August 13, 2018, in the District of Massachusetts and elsewhere,

**ROBERT D. CHAIN,**

defendant herein, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit: a telephone call originating outside the Commonwealth of Massachusetts answered by Individual B, a *Globe* employee located in Boston, Massachusetts, in which he stated, “you are the enemy of the people. We will hunt you down and kill you and your dogs.” CHAIN made these statements intending that his message communicate a threat and knowing that it would be interpreted as a threat.

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 4**

**(18 U.S.C. § 875(c) – Use of Interstate and Foreign Commerce  
to Transmit a Threat to Injure Another Person)**

11. The allegations contained in paragraphs 1 through 4 are re-alleged and incorporated herein by reference.

12. On or about August 13, 2018, in the District of Massachusetts and elsewhere,

**ROBERT D. CHAIN,**

defendant herein, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit: a telephone call originating outside the Commonwealth of Massachusetts answered by Individual A, a *Globe* employee located in Boston, Massachusetts, in which he stated, “hey how does your pussy smell today honey, nice and fresh? We’re gonna shoot you motherfuckers in the head, you Boston Globe cocksuckers. We’re gonna shoot every fucking one of you.” CHAIN made these statements intending that his message communicate a threat and knowing that it would be interpreted as a threat.

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 5**

**(18 U.S.C. § 875(c) – Use of Interstate and Foreign Commerce  
to Transmit a Threat to Injure Another Person)**

13. The allegations contained in paragraphs 1 through 4 are re-alleged and incorporated herein by reference.

14. On or about August 13, 2018, in the District of Massachusetts and elsewhere,

**ROBERT D. CHAIN,**

defendant herein, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit: a telephone call originating outside the Commonwealth of Massachusetts answered by Individual C, a *Globe* employee located in Boston, Massachusetts, in which he stated, “you are the enemies of the people. We’re going to kill you all.” CHAIN made these statements intending that his message communicate a threat and knowing that it would be interpreted as a threat.

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 6**

**(18 U.S.C. § 875(c) – Use of Interstate and Foreign Commerce  
to Transmit a Threat to Injure Another Person)**

15. The allegations contained in paragraphs 1 through 4 are re-alleged and incorporated herein by reference.

16. On or about August 15, 2018, in the District of Massachusetts and elsewhere,

**ROBERT D. CHAIN,**

defendant herein, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit: a telephone call originating outside the Commonwealth of Massachusetts answered by Individual B, a *Globe* employee located in Boston, Massachusetts, in which he stated, “we’re going to kill every fucking one of you. Go fuck yourself. Call the FBI. Go get some help from fucking Mueller okay you cocksucker. You’re a dead man.” CHAIN made these statements intending that his message communicate a threat and knowing that it would be interpreted as a threat.

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 7**

**(18 U.S.C. § 875(c) – Use of Interstate and Foreign Commerce  
to Transmit a Threat to Injure Another Person)**

17. The allegations contained in paragraphs 1 through 4 are re-alleged and incorporated herein by reference.

18. On or about August 16, 2018, in the District of Massachusetts and elsewhere,

**ROBERT D. CHAIN,**

defendant herein, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit: a telephone call originating outside the Commonwealth of Massachusetts answered by Individual B, a *Globe* employee located in Boston, Massachusetts, in which he stated:

you're the enemy of the people and we're going to kill every fucking one of you. Hey why don't you call F, why don't you call Mueller? Maybe he can help you out buddy. Still there faggot? Alright why? You gonna trace my call? What are you going to do motherfucker? You ain't gonna do shit. I'm gonna shoot you in the fucking head later today at 4 o'clock. Goodbye.

CHAIN made these statements intending that his message communicate a threat and knowing that it would be interpreted as a threat.

All in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL




Foreperson of the Grand Jury



George P. Varghese  
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS, Boston, MA, September 18, 2018

Returned into the District Court by the Grand Jurors and filed.

  
Deputy Clerk

9/18/2018

@ 10:36 AM